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8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

2:19-CR-064-APG-NJK

10 Plaintiff,

**Government's Unopposed Motion to  
Extend the Time to File its Response  
Regarding Motion for Ancillary Hearing,  
ECF No. 166, and Order**

11 v.

12 KING ISAAC UMOREN,

13 Defendant,

**(Second Request)**

14 EAST HAWLEYWOOD OWNERS'  
ASSOCIATION,

15 Petitioner.

16  
17 The United States of America respectfully moves this Court for an Order extending  
18 the time for the government to file its response regarding East Hawleywood Owners'  
19 Association's (EHOA) Motion for Ancillary Hearing, ECF No. 166. The current deadline is  
20 September 29, 2022. The government requests an extension of time to and including  
21 October 27, 2022. This is the second request.

22 The reason for this extension is the HOA board is reviewing the proposed  
23 stipulation and has not approved it.

24 On August 16, 2022, EHOA filed its Petition for Ancillary Hearing. It is not a  
25 motion. After third parties file petitions and after the district court resolves any  
26 government motions to dismiss the third-party petitions, the district court may permit  
27 discovery according to the Federal Rules of Civil Procedure.<sup>1</sup>

28  
1 Fed. R. Crim. P. 32.2(c)(1)(a) and (B).

1 On August 18, 2022, the undersigned began negotiating a stipulation for entry of  
2 forfeiture with Troy Isaacson, counsel for EHOA. The undersigned received the required  
3 additional billing information from EHOA through its counsel on September 9, 2022.

4 On September 19, 2022, Mr. Isaacson agreed to a month extension.

5 This Motion is not submitted solely for the purpose of delay or for any other  
6 improper purpose.

7 This Court should grant an extension of time to, and including, October 27, 2022.

8 DATED: September 19, 2022.

9 JASON M. FRIERSON  
10 United States Attorney

11 /s/ Daniel D. Hollingsworth  
12 DANIEL D. HOLLINGSWORTH  
13 Assistant United States Attorney

14 IT IS SO ORDERED:

15   
16 ANDREW P. GORDON  
17 UNITED STATES DISTRICT JUDGE

18 DATED: September 20, 2022